

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)

**CERTIFICATION OF C. BRETT VAUGHN IN SUPPORT OF
PLAINTIFFS' DAUBERT MOTION TO EXCLUDE TESTIMONY OF
JON P. FRYZEK, MPH, PH.D.**

C. BRETT VAUGHN, hereby certifies as follows:

1. I am an attorney at law within the State of Kansas with the Hollis Law Firm, and serve on the Plaintiff's Executive Committee. I am fully familiar with the facts and circumstances of these actions. I make this Certification in support of Plaintiffs' motion to exclude the testimony of Jon P. Fryzek, MPH, Ph.D.
2. Attached hereto as **Exhibit A** is a true and accurate copy of Jon Fryzek's Report.
3. Attached hereto as **Exhibit B** is a true and accurate copy of the September 30, 2021 Deposition Transcript of Jon Fryzek.
4. Attached hereto as **Exhibit C** is a true and accurate copy of Stern, *Beware of the Literature: Investigation of Adversary's Treatises is Now Required*, NEW JERSEY LAW JOURNAL PERSONAL INJURY Vol. CXCIII, No. 12, Index 866 (Sept. 2008).
5. Attached hereto as **Exhibit D** is a true and accurate copy of Jon Fryzek's LinkedIn profile.

6. Attached hereto as **Exhibit E** is a true and accurate copy of Jon Fryzek's July 2021 CV.

7. Attached hereto as **Exhibit F** is a true and accurate copy of the February 8, 2005 Deposition Transcript of Jon Fryzek.

8. Attached hereto as **Exhibit G** is a true and accurate copy of Jon Fryzek's August 2021 CV.

9. Attached hereto as **Exhibit H** is a true and accurate copy of Jon Fryzek's fee schedule.

10. Attached hereto as **Exhibit I** is a true and accurate copy of Jon Fryzek's invoices.

11. Attached hereto as **Exhibit J** is a true and accurate copy of Janice Lansita's LinkedIn profile.

12. Attached hereto as **Exhibit K** is a true and accurate copy of United States District Judge Kathleen M. O'Malley's August 31, 2009 Evidentiary Order in the Welding Fume Products Liability Litigation (1:03-cv-17000-KMO).

13. Attached hereto as **Exhibit L** is a true and accurate copy of Yet Hau Loh, et al., *N-nitroso Compounds and Cancer Incidence: The European Prospective Investigation into Cancer and Nutrition (EPIC)-Norfolk Study*, AM J CLIN NUTR 93:1053-61 (2011).

14. Attached hereto as **Exhibit M** is a true and accurate copy of Kristen M. Fedak, et al., *Applying the Bradford Hill Criteria in the 21st Century: How Data Integration Has Changed Causal Inference in Molecular Epidemiology*, EMERG THEMES EPIDEMIOLOG 12:14 (2015).

15. Attached hereto as **Exhibit N** is a true and accurate copy of Paolo Boffetta, Jon P. Fryzek, & Jack S. Mandel, *Occupational Exposure to Beryllium and Cancer Risk: A Review of the Epidemiologic Evidence*, 42(2) CRITICAL REVIEWS IN TOXICOLOGY 107-118 (2012).

16. Attached hereto as **Exhibit O** is a true and accurate copy of Jon P. Fryzek, et al., *Cancer Mortality in Relation to Environmental Chromium Exposure*, 43(7) J. OCCUPATIONAL ENVTL. MED. 635-640 (2001).

17. Attached hereto as **Exhibit P** is a true and accurate copy of *In re Twenty-Fourth Statewide Investigating Grand Jury*, No. CP-02-MD-5947-2017 at *210-215, *221 n. 47, 50 (Pa. Super. Ct. June 22, 2020), <https://www.attorneygeneral.gov/wp-content/uploads/2020/06/FINAL-fracking-report-w.responses-with-page-number-V2.pdf>.

18. Attached hereto as **Exhibit Q** is a true and accurate copy of Jon Fryzek, et al., *Childhood Cancer Incidence in Pennsylvania Counties in Relation to Living in Counties with Hydraulic Fracturing Sites*, 55(7) J. OCCUPATIONAL ENVTL. MED. 796-801 (2013).

19. Attached hereto as **Exhibit R** is a true and accurate copy of *Player v. Motiva Enterprises LLC*, No. Civ. 02-3216(RBK), 2006 WL 166452 (D.N.J. January 20, 2006).

HOLLIS LAW FIRM
Attorneys for Plaintiffs

Dated: November 1, 2021

By: /s/ C. Brett Vaughn
C. Brett Vaughn RN, BSN, JD
Hollis Law Firm
8101 College Blvd, Suite 260
Overland Park, KS 66210
Ph: 913-385-5400
Fax: 913-385-5402
Brett@HollisLawFirm.com